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Attorneys for Defendant,
 WESTCOR LAND TITLE INSURANCE
 COMPANY

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

* * *

DEUTSCHE BANK NATIONAL TRUST
 COMPANY AS TRUSTEE FOR NEW
 CENTURY HOME EQUITY LOAN TRUST,
 SERIES 2005-D, ASSET BACKED
 PASSTHROUGH CERTIFICATES,
 Plaintiff,

vs.

WESTCOR LAND TITLE INSURANCE
 COMPANY; DOE INDIVIDUALS I through X;
 and ROE CORPORATIONS XI through XX,
 inclusive,

Defendants.

CASE NO. 2:20-cv-01706-APG-VCF

**STIPULATION AND ORDER TO
 EXTEND TIME PERIOD TO
 RESPOND TO OPPOSITION TO
 MOTION TO DISMISS [ECF 23]
 AND COUNTERMOTION FOR
 SUMMARY JUDGMENT [ECF 24]
 AND TO EXTEND PAGE LIMIT
 FOR REPLY**

[First Request]

COME NOW Plaintiff, Deutsche Bank National Trust Company as Trustee for New
 Century Home Equity Loan Trust, Series 2005-D, Asset Backed Pass-Through Certificates
 (“Deutsche Bank”), and Defendant, Westcor Land Title Insurance Company (“Westcor”)
 (collectively, the “Parties”), by and through their respective attorneys of record, and hereby
 stipulate and agree as follows:

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- 1 1. On August 21, 2020, Deutsche Bank filed its Complaint in Eighth Judicial District
- 2 Court, Case No. A-20-819973-C [ECF No. 1-2].
- 3 2. On September 15, 2020, Westcor filed a Petition for Removal to this Court [ECF No.
- 4 1].
- 5 3. On September 22, 2020, Westcor filed a Motion to Dismiss [ECF No. 9].
- 6 4. On October 26, 2020, Deutsche Bank filed its response to Westcor's Motion to
- 7 Dismiss, entitled Opposition to Motion to Dismiss and Countermotion for Summary
- 8 Judgment [ECF Nos. 23 and 24].
- 9 5. Because Deutsche Bank's response to Westcor's Motion to Dismiss included a
- 10 Countermotion for Summary Judgment, the deadline for Westcor to file its Reply to
- 11 Deutsche Bank's Opposition [ECF No. 23] is earlier than its deadline to file its
- 12 Response to Deutsche Bank's Countermotion for Summary Judgment [ECF No. 24].
- 13 6. In accordance with FRCP 1, Westcor intends to file a single memorandum of points
- 14 and authorities (filed twice to comply with local rules), to respond to ECF No. 23 and
- 15 ECF No. 24.
- 16 7. The timing of Deutsche Bank's filing of the Response created a scheduling conflict for
- 17 Westcor's counsel due to Westcor's counsels' prior commitment to volunteer the week
- 18 of October 27, 2020.
- 19 8. The parties have discussed extending the deadline for Westcor to file its Reply and
- 20 Response, extending the deadline to file its Reply by three weeks and extending the
- 21 deadline to file its Response by one week, such that the deadline for both filings would
- 22 be extended to November 23, 2020.
- 23 9. The parties further stipulated that the thirty (30) page limit imposed for responses to
- 24 motions for summary judgment will apply to Westcor's combined points and
- 25 authorities.
- 26 10. These extensions are requested to allow counsel for Westcor additional time to review
- 27 and respond to the points and authorities filed by Deutsche Bank while still allowing
- 28 Westcor's counsel to comply with its previously planned volunteer commitments.

11. Counsel for Deutsche Bank does not oppose the requested extension.

12. This is the first request for an extension which is brought in good faith and not for purposes of delay.

DATED this 30th day of October, 2020.

DATED this 30th day of October, 2020.

MAURICE WOOD

WRIGHT, FINLAY & ZAK, LLP

By: /s/ Brittany Wood

By: /s/ Darren T. Brenner

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Attorneys for Plaintiff

Attorneys for Defendant

DATED: November 2, 2020

IT IS SO ORDERED.


UNITED STATES DISTRICT COURT JUDGE

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